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BORDEN PACKAGING and INDUSTRIAL PRODUCTS

DOMESTIC AND INTERNATIONAL
DIVISION OF BORDEN, INC.



July 16, 1993

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

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JUL 20 1993

**OFFICE OF RCRA
WASTE MANAGEMENT DIV
EPA, REGION V**

Re: PRC Preliminary Assessment/Visual Site Inspection of
Columbus Coated Fabrics Final Report - April 21, 1993 - HRE-8J - Page 12

Dear Mr. Pierard:

This letter is written in response to two items in Section 2.4 "History of Documented Releases" on page 12 of the final PRC Preliminary Assessment/Visual Site Inspection (PA/VSI) report we received from your office.

Item 1

In the third paragraph of section 2.4, it is stated that:

"CCF submitted an amendment with their POTW permit to install an aerobic digestion pretreatment unit on February 9, 1988. The pretreatment unit will treat ground water from AOC 1 contaminated by MIBK, Xylene, MEK, and toluene...
...The permit to discharge wastewater was approved, but the amendment was denied in 1989."

The City of Columbus POTW implemented their sanitary discharge permitting requirements in 1991 at which time CCF obtained a permit (CCF has requested and received approval to discharge from the City of Columbus prior to 1991). On January 30, 1989, CCF was granted a Permit-to-Install (PTI) for treatment of contaminated water in underground tanks #38 through #41 and underground tanks #46 through #56. Ground water was not treated. Furthermore, we find no confirmation in our records that CCF submitted an amendment for either the PTI or a POTW permit. Therefore, there was no amendment to be denied.

Item 2

In the fourth paragraph of section 2.4, it stated that:

"No soil samples were taken to verify that the spill was completely cleaned up."

Concerning this November 27, 1991 spill by Schneider Tank Lines of waste ink in the North Loading Dock area, both the verbal notification made to various agencies and the written report submitted to the Regional Administrator of the U.S. EPA and the Director of the Ohio EPA contained the following paragraph:

"Because the spill occurred in the paved loading dock area, and because it was detected so quickly, this spill did not leave the Columbus Coated Fabrics property nor did it enter the sanitary or storm water sewer systems or any porous surface. The air temperature was approximately 40-45°F which minimized ambient air evaporation during the estimated three (3) hours of clean-up activity. Hazard to the environment is, therefore, considered minimal."

COLUMBUS COATED FABRICS

1280 NORTH GRANT AVENUE, 43201, P.O. BOX 208, 43216, COLUMBUS, OHIO • TELEPHONE 614-297-6000

Contrary to the implications of the PRC Visual Site Assessment report, there was no soil to sample for verification that the spill was completely cleaned up. This is confirmed by the stain left on the loading dock pad by the ink. The ink stain was shown to the PRC representative (Gabriel Rood), to confirm that no soil was involved in the spill. Therefore, the highlighted statement should be modified to read, "No soil samples were required to verify that the spill was completely cleaned up".

Sincerely,



Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
encl.

DATE: July 21, 1993

TO: Shin Ahn

FROM: Kevin Pierard

Attached is a letter from Borden Packaging regarding the Columbus Coated Fabrics facility PA/VSI. This letter is being placed in the file with the PA/VSI, and sent to you for your information only.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Grover B. Thomas
Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43215

Re: Visual Site Inspection
Columbus Coated Fabrics
Columbus, Ohio
OHD 004 294 351

Dear Mr. Thomas:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**COLUMBUS COATED FABRICS
COLUMBUS, OHIO
OHD 004 294 351**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD004294351
Date Prepared	:	March 22, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH2E
Prepared by	:	PRC Environmental Management, Inc. (Gabriel Rood)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Columbus Coated Fabrics (CCF) facility in Columbus, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The CCF facility has operated at its present location since 1902, and employs about 550 people. The facility occupies 16.25 acres in a mixed industrial, commercial, and residential area. CCF manufactures various grades of residential and commercial vinyl wall covering products, and customized laminate products for the automotive, appliance, home entertainment, and industrial markets. Wall covering products include prepasted vinyl, prepasted ground coated surfaces, vinyl nonwoven surfaces, and metallized surfaces. In addition, vinyl substrates used in the manufacture of dental film for x-rays are also produced by CCF.

The facility generates and manages the following waste streams: spent solvent (D001, D007, D008, F003, F005, and K086); waste ink (D001, D007, D008, F003, F005, K086); dust stop oil (D006 and D008); spent stripper (D007); muriatic acid-soaked rags (D007); spent muriatic acid (D007); sludge (F006); nonhazardous wastewater; chromic acid-soaked rags (D002 and D007); and waste urethane solvent (D001 and F005). In the past, the facility has generated spent filter bags (D006), spent monoethanolamine (D001), spent ferric chloride (D002 and D007), spent xylene developer (D001), xylene developer die absorbent mat/socks (D001 and D007), spent zinc chloric developer (D002 and D007), and electroplating wastewater treatment sludge ferric chloride filter cake and filters (F006).

The PA/VSI identified the following seven SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Building 88 Satellite Accumulation Area (SAA)
2. Building 95 Hazardous Waste Storage Area (HWSA)
3. Building 37 HWSA
4. Building 111 SAA
5. Building 101 SAA
6. Treatment Sump
7. Building 23 SAA

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Area of Concern

1. Removed Underground Storage Tank Area

In 1902, The Columbus Oil Cloth Company, located at Seventh and Grant Avenues, began manufacturing oil cloth. On March 27, 1917, Columbus Oil Cloth Company and Union Oil Cloth Company consolidated to form the Columbus-Union Oil Cloth Company. In 1925, the facility began manufacturing coated fabric-backed wall coverings under the trade name Murolum or Wall-Tex® and began using solvents. The facility began manufacturing products coated with nitrocellulose in 1929. A pyroxylin coating plant was constructed in 1929, and pyroxylin coating operations began. In December 1929, the name of the corporation was changed to Columbus Coated Fabrics. In 1945, CCF began using calender equipment to produce polyvinyl chloride (PVC) products. CCF also began printing, embossing, and laminating operations in conjunction with the plastics operations. On July 27, 1961, Borden, Inc., and CCF signed a "Plan of Reorganization and Agreement," making CCF a division of the Borden Packaging and Industrial Products Division of Borden, Inc. CCF now manufactures a variety of vinyl wallcovering products, and vinyl substrate products.

A closure plan for SWMU 1 was submitted to Ohio Environmental Protection Agency (OEPA) and EPA in 1992, but has not been approved yet. The facility is currently working with the City of Columbus and the State Fire Marshall to close the two product USTs.

Twenty-three underground storage tanks (AOC 1) were removed in September 1989, when it was discovered during construction activities for a containment wall, that the tanks were leaking a variety of solvents, fuel oil, gasoline, and kerosene. Releases to on-site soil and ground water were documented. Environmental sampling was performed, and currently a remediation system is being designed.

SWMUs 3, 5, 6, and 7 appear to be operated and maintained in a manner that limits the potential for releases to environmental media. SWMU 3 is scheduled to undergo full closure in 1992.

Building 95 (SWMU 2) is the primary HWSA. The dock wall located outside the door to Building 95 has a wall-mounted valve that is used to transfer wastes to tanker trucks. Tank trucks use a hose that hooks into the valve to pump the waste from drums inside the building to the tank truck. A release to soils occurred in this area in 1991, during transfer operations. Spilled material was cleaned up. No soil sampling was performed to determine if the clean-up was complete. The potential for release to ground water is moderate. It is not known if ground

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water was impacted by this spill. No release controls are present in this area. PRC recommends soil sampling be performed to determine the extent of contamination.

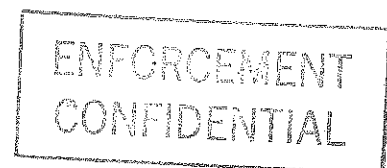
For the SAAs in both Building 88 (SWMU 1) and Building 111 (SWMU 4), the potential for release to air is high. The units are located indoors on concrete floors but housekeeping practices are poor. Evidence of spills observed indicate that wastes are allowed to volatilize into the building's air space. A drum with an open funnel was also observed at the Building 88 SAA. PRC recommends the facility improve its waste management practices and store drums closed with no funnels in the bungs unless fill operations are in progress.

Ground water is used for industrial purposes both on site, and within about three miles south of the facility. The nearest off-site industrial water well is 1,000 feet southeast of CCF. This well is downgradient of the facility. No drinking water is obtained from ground water in this area of Franklin County.

The CCF facility is bordered on the north by several small service businesses and the Ohio State Fairgrounds. The facility is bordered on the west by parking lots and a residential neighborhood. Several large industrial facilities exist to the south. The Chesapeake and Ohio, Norfolk and Western, and Conrail Railroads switching yards border the eastern edge of the facility. The nearest school, Weinland Park School, is located about 1,000 feet west of the facility. Facility access is controlled by 24-hour security guards and a 10-foot chain link security fence. There are no sensitive environments located on or within two miles of the facility.

In summary PRC recommends that SWMU 2 be investigated for possible soil contamination and that the facility improve its waste management practices at SWMUs 1 and 4. Drums at SWMU 1 should be stored closed when not being filled. PRC recommends the facility continue to work with OEPA to close the Building 37 HWSA (SWMU 3). PRC also recommends the facility continue to work with OEPA to obtain approval of remedial activities at AOC 1.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Columbus Coated Fabrics (CCF), facility in Columbus, Ohio, OHD 004 294 351. The PA was completed on May 18, 1992. PRC gathered and reviewed information from Ohio Environmental Protection Agency (OEPA), Ohio Department of Natural Resources (ODNR), Federal Emergency Management Agency (FEMA), and EPA Region 5 RCRA files. The VSI was conducted on May 19, 1992. It included interviews with three facility representatives and a walk-through inspection of the facility. Seven SWMUs and one AOC were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and six inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The CCF facility is located at 1280 North Grant Avenue in Columbus, Franklin County, Ohio (latitude 39°59'23" N and longitude 82°59'23" W) as shown in Figure 1. The facility occupies 16.25 acres in a mixed industrial, commercial, and residential area.

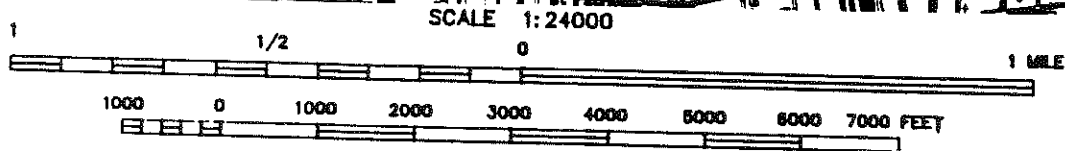
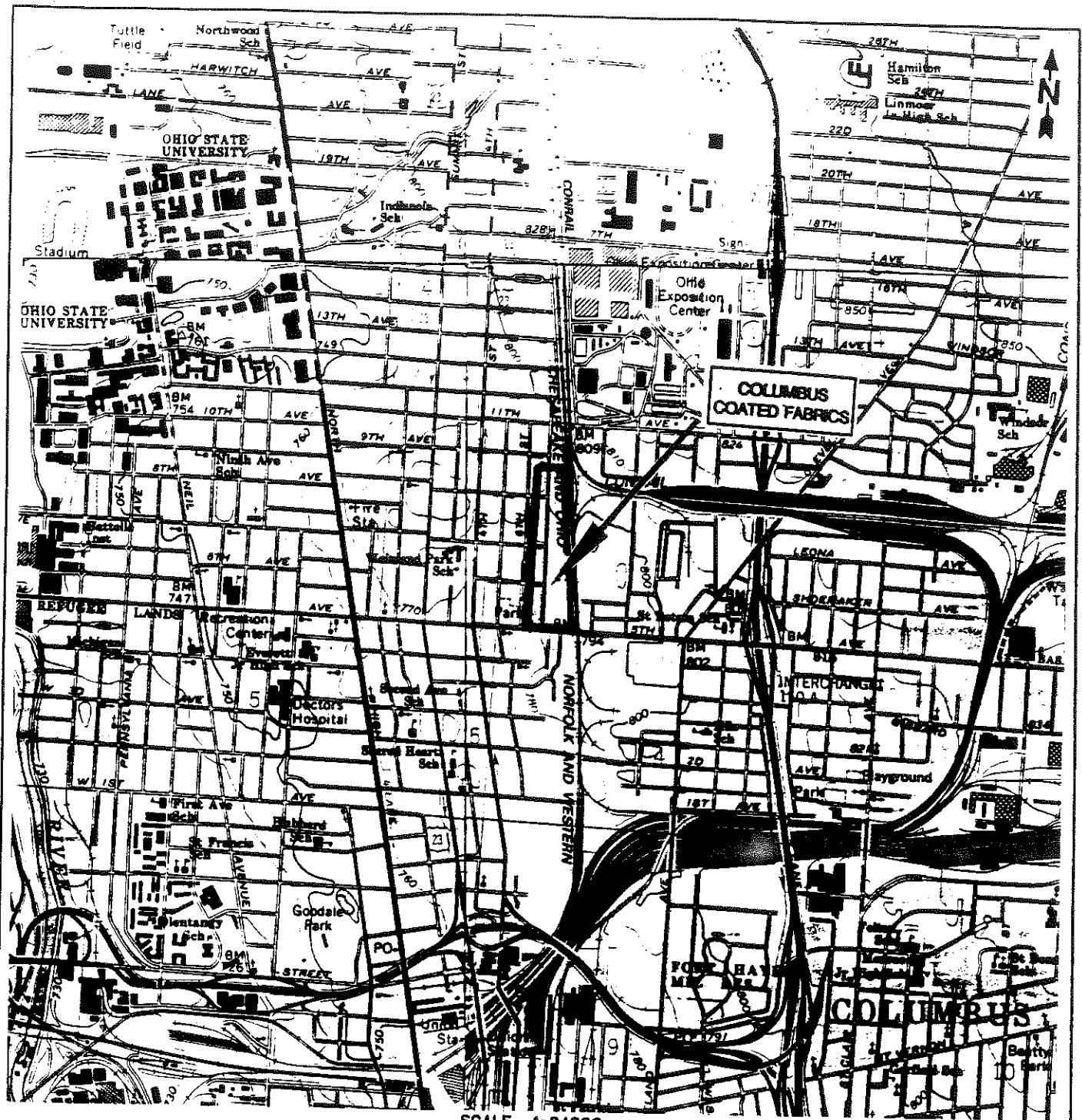
The CCF facility is bordered on the north by several small service businesses and the Ohio State Fairgrounds. The facility is bordered on the west by parking lots and a residential neighborhood. Several large industrial facilities exist to the south. The Chesapeake and Ohio, Norfolk and Western, and Conrail Railroads switching yards border the eastern edge of the facility (see Figure 1).

2.2 FACILITY OPERATIONS

The CCF facility currently manufactures various grades of residential and commercial vinyl wall covering products, and customized laminate products for the automotive, appliance, home entertainment, and industrial markets. Wall covering products include prepasted vinyl strippable, prepasted ground-coated strippable, vinyl nonwoven, and metallized surfaces (CCF, 1981). In addition, vinyl substrates used in the manufacture of dental film for x-rays are also produced by CCF. The CCF facility has operated at its current location since 1902 and employs about 550 people. The present facility consists of about 100 buildings (most buildings are additions to older existing buildings) and parking lots on both sides of Grant Avenue, covering 600,000 square feet (see Figure 2).

Solvent- and water-based printing operations use large automated printers in the application of patterns and designs on wallcovering products. These printing operations generate the majority of hazardous waste at the facility. Printing operations generate hazardous waste during color changeover operations and ink management operations. These operations generate spent solvent and waste ink.

In 1902, The Columbus Oil Cloth Company, located at Seventh and Grant Avenues, began manufacturing oil cloth. On March 27, 1917, Columbus Oil Cloth Company and Union Oil Cloth

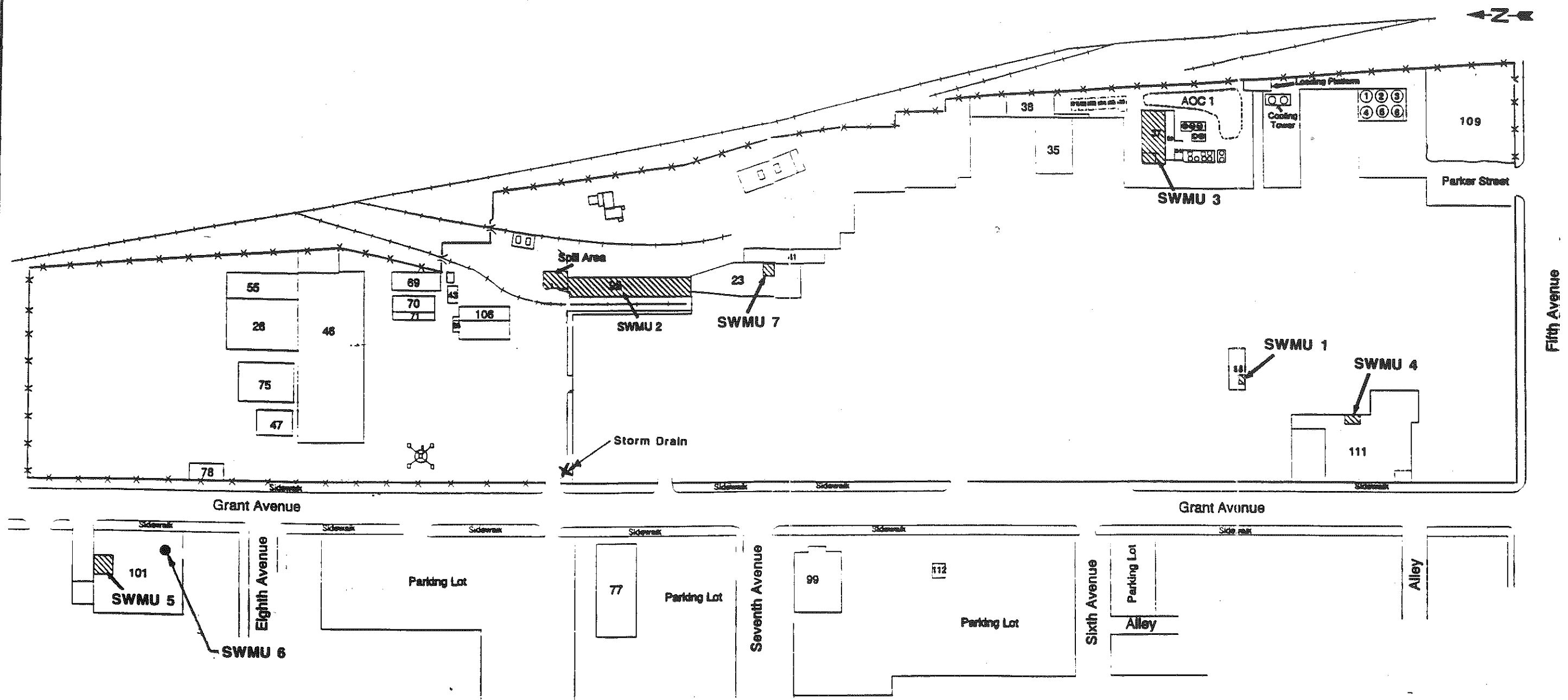


SOURCE: ADAPTED FROM USGS NW COLUMBUS, NE COLUMBUS, SE COLUMBUS, AND SW COLUMBUS QUADRANGLES, 1982a, 1982b, 1983, and 1984

COLUMBUS COATED FABRICS CORPORATION
COLUMBUS, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

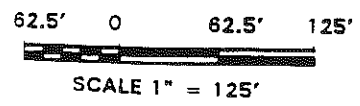


SWMU

- SWMU 1. Building 88 Satellite Accumulation Area
- SWMU 2. Building 95 Hazardous Waste Storage Area
- SWMU 3. Building 37 Hazardous Waste Storage Area
- SWMU 4. Building 111 Satellite Accumulation Area
- SWMU 5. Building 101 Satellite Accumulation Area
- SWMU 6. Treatment Sump
- SWMU 7. Building 23 Satellite Accumulation Area

AOC

- 1 - Removed Underground Storage Tank Area



COLUMBUS COATED FABRICS CORPORATION COLUMBUS, OHIO
FIGURE 2 FACILITY LAYOUT AND SWMU LOCATIONS
PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: ADAPTED FROM CCF. SKETCH RECEIVED BY PRC, MAY, 1992

Company consolidated to form the Columbus-Union Oil Cloth Company. In 1925, the facility began manufacturing coated fabric-backed wallcoverings under the trade name Muroloom or Wall-Tex® and began using solvents. In 1929, the facility began manufacturing products coated with nitrocellulose. A pyroxylin coating plant was constructed, and pyroxylin coating operations began. In December 1929, the name of the corporation was changed to Columbus Coated Fabrics. In 1945, the facility began using calender equipment to produce polyvinyl chloride (PVC) products. CCF also began printing, embossing, and laminating operations in conjunction with the plastics operations. On July 27, 1961, Borden, Inc. and CCF signed a "Plan of Reorganization and Agreement," making CCF a part of the Borden Packaging and Industrial Product Division of Borden, Inc. (CCF, 1981). CCF now manufactures a variety of vinyl wallcovering products, and vinyl substrate products.

Raw materials used in current production operations include powdered PVC, various dry pigments (titanium dioxide), powdered stabilizers, and powdered plasticizers. These materials are mixed to manufacture the PVC substrate. The mixers use a barium, lead, and zinc lubricant which is normally incorporated into the final product. Excess lubricant, called dust stop oil, is sometimes generated and disposed of as D006 or D008 hazardous waste. CCF uses underground storage tanks for storage of solvents. Plasticizers are stored in above ground tanks. Bulk resins are delivered by rail, but all other raw materials are delivered by truck.

Historically, Building 101 housed a full scale electroplating operation. Presently, small scale electroplating operations are performed for rechroming of thin spots on printing cylinders. Both before and after the printing cylinders are replated, additional treatment steps are required. These additional steps generate several hazardous waste streams. Chrome electroplating generates spent fluids that are discharged to the city sewer system through a Treatment Sump (SWMU 6).

In addition, urethane operations at the facility generate hazardous waste from equipment cleaning activities. Table 1 contains a complete list of SWMUs, and the status of these units.

2.3 WASTE GENERATING PROCESSES

The primary waste generating processes are color changeover operations and ink management operations. In addition, PVC substrate product, chrome electroplating operations, and urethane production generate waste. The waste generating processes and management of wastes is described below.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Building 88 Satellite Accumulation Area (SAA)	No	Active
2	Building 95 HWSA	No	Active
3	Building 37 HWSA	Yes	Active; Closure plan submitted to OEPA and EPA; plan is currently being reviewed
4	Building 111 SAA	No	Active
5	Building 101 SAA	No	Active
6	Treatment Sump	No	Active
7	Building 23 SAA	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Primary Management Unit^b</u>
Spent solvent/D001, D007, D008, F003, F005, and K086	Cleaning printing equipment and ink production equipment	1, 2, and 3
Waste ink/D001, D007, D008, F003, F005, K086	Printing operations	2 and 4
Dust stop oil/D006 ^c and D008	PVC substrate production	3
Spent filter bags/D006 ^c	PVC substrate production	3
Spent stripper/D007	Chrome removal to expose copper cylinders of print roller	2 and 5
Muriatic acid-soaked rags/D007	Copper cylinder treatment	2 and 5
Spent muriatic acid/D007	Copper cylinder treatment	2 and 5
Sludge/F006	Electroplating waste treatment sump	2, 5, and 6
Wastewater/NA	Electroplating waste treatment sump	6
Chromic acid-soaked rags/D002 and D007	Copper cylinder treatment	2 and 5
Waste urethane solvent/D001 and F005	Cleaning urethane operations equipment	2 and 7
Spent monoethanolamine/D001 ^c	Electroplating line	Unknown
Spent ferric chloride/D002 and D007 ^c	Electroplating line	Unknown
Spent xylene developer/D001 ^c	Electroplating line	Unknown

TABLE 2 (Continued)
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Primary Management Unit^b</u>
Spent xylene developer die absorbent mat/socks/D001 and D007 ^c	Electroplating line	Unknown
Spent zinc chloric developer/ D002 and D007 ^c	Electroplating line	Unknown
Electroplating wastewater treatment sludge ferric chloride filter cake and filters/F006 ^c	Electroplating line	Unknown

Notes:

- ^a Not applicable (NA) designates nonhazardous waste.
- ^b "Unknown" indicates that the waste was generated at the facility but that the SWMU that managed the waste cannot be determined.
- ^c This waste is no longer generated at the facility.

Color changeover operations involve cleaning the printing equipment and ink production equipment with a methyl ethyl ketone-methyl isobutyl ketone (MEK-MIBK) solvent mixture. The solvent mixture is used to clean ink from rollers, drums, pans, tubs, and roller presses generating spent solvent (D001, D007, D008, F003, F005, and K086). Spent solvent generated from ink production equipment cleaning is accumulated in 55-gallon drums at Building 88 SAA (SWMU 1). The drums are moved to Building 95 Hazardous Waste Storage Area (HWSA) (SWMU 2) for less than 90-day storage. Spent solvent from printing equipment cleaning is stored at Building 37 HWSA (SWMU 3). The spent solvent is accumulated as both liquid and solid waste. Cousins Waste Control of Toledo, Ohio, transports the spent solvent off site to Petro Chem of Detroit, Michigan, for fuels blending. In 1991, the facility generated about 1,320 gallons of solid spent solvent and 760 gallons of liquid spent solvent.

Batches of solvent-based ink used in the printing operations are recycled until the ink quality deteriorates and the batch no longer meets specifications. Waste ink (D001, D007, D008, F003, F005, and K086) is accumulated in 55-gallon drums at Building 111 SAA (SWMU 4). Filled drums are moved to Building 95 HWSA (SWMU 2) for less than 90-day storage. Schneider Tank Lines of Wisconsin transports the waste ink off site to Safety-Kleen Corporation of Dolton, Illinois, for reclamation. The facility generated 166,615 gallons of waste ink in 1991.

PVC substrate production involves blending dry resin, pigments, and stabilizers that contain lead and zinc. Until January 1992, a stabilizer containing cadmium was also used. Residual product, called dust stop oil (D006 and D008), is removed from the mixers and accumulated in 55-gallon drums in Building 37 HWSA (SWMU 3) until it can be recycled back into the process. Frequently, more dust stop oil is generated than can be recycled back into the process. Excess dust stop oil is transported off site to Usher Oil of Detroit, Michigan, for disposal. In 1991, the facility generated 14,775 gallons of dust stop oil.

PVC substrate production also generated spent filter bags (D006) until January 1992. Since then, the cadmium stabilizer has been replaced with a nonhazardous stabilizer. Building 37 HWSA (SWMU 3) accumulated spent filter bags in 55-gallon drums. Spent filter bags were transported off site to Usher Oil of Detroit, Michigan, for disposal.

The facility operates a small chrome electroplating line to replace the chrome surface on print rollers. Initially, PR-100 Strip a nonhazardous stripping agent is used to remove the chrome to expose the copper cylinder of the roller generating a spent stripper (D007). This waste is accumulated in 55-gallon drums at Building 101 SAA (SWMU 5) and then moved to SWMU 2 for less than 90-day storage. Cousins Waste Control of Toledo, Ohio, transported the spent stripper

(D007) to Petro Chem of Detroit, Michigan, for disposal. In 1991, the facility generated about 30 gallons of spent stripper (D007).

Muriatic acid is applied and wiped off the copper cylinders prior to electroplating, generating muriatic acid-soaked rags (D007) and spent muriatic acid (D007). These wastes are accumulated in Building 101 SAA (SWMU 5) and then moved to Building 95 HWSA (SWMU 2) for less than 90-day storage. In 1991, Cousins Waste Control of Toledo, Ohio, transported off site 55-gallons of muriatic acid-soaked rags to Michigan Disposal, Inc., of Belleville, Michigan, for disposal. Also, Cousins Waste Control of Toledo, Ohio, transported off site 550 gallons of spent muriatic acid (D007) to CyanoKEM of Detroit, Michigan, for treatment.

Electroplating generates spent fluids that are discharged to the city sewer system through a limestone Treatment Sump (SWMU 6) in Building 101. The Treatment Sump (SWMU 6) collects sludge (F006) and discharges nonhazardous wastewater to the city sewer system. The sludge is removed from the sump and accumulated in 55-gallon drums in Building 101 SAA (SWMU 5) and then moved to Building 95 HWSA (SWMU 2) for less than 90-day storage. Cousins Waste Control of Toledo, Ohio, transported the sludge (F006) off site to Michigan Disposal, Inc., of Belleville, Michigan, for disposal. In 1991, the facility generated about 680 gallons of sludge. The wastewater discharge to the city sewer system is permitted under a publicly-owned treatment works (POTW) program. The permit allows 2,000 gallons per day of wastewater discharge.

After electroplating, the cylinders are wiped with chromic acid, generating chromic acid-soaked rags (D002 and D007). This waste is accumulated in 55-gallon drums in the Building 101 SAA (SWMU 5) and then moved to Building 95 HWSA (SWMU 2) for less than 90-day storage. In 1991, the facility generated 165 gallons of chromic acid-soaked rags (D002 and D007). Cousins Waste Control of Toledo, Ohio, transported the waste off site to CyanoKEM of Detroit, Michigan, for treatment.

Urethane operations require cleaning equipment with MEK solvent, generating waste urethane solvent (D001 and F005). This waste is accumulated separately as liquid and solid waste in 55-gallon drums in the Building 23 SAA (SWMU 7), then moved to Building 95 HWSA (SWMU 2) for less than 90-day storage. Cousins Waste Control of Toledo, Ohio, transports the waste urethane solvent off site to Petro Chem of Detroit, Michigan, for disposal. In 1991, the facility generated 5,995 gallons of liquid and 660 gallons of solid waste urethane solvent (D001 and F005).

From the late 1950s to about 1989, the facility operated a full-scale electroplating line. The electroplating line generated the following wastes: spent monoethanolamine (D001), spent

ferric chloride (D002 and D007), spent xylene developer (D001), xylene developer die absorbent mat/socks (D001 and D007), spent zinc chloric developer (D002 and D007), and electroplating wastewater treatment sludge ferric chloride filter cake and filters (F006). The facility phased out electroplating operations and specific information regarding waste generation rates and disposal facilities was not revealed during the file review or VSI.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils, at the CCF facility.

The Removed Underground Storage Tank Area (AOC 1) is located on the southeast side of Building 37. CCF used underground storage tanks (USTs) until 1986, for storage of solvents. Volatile organic contamination was discovered in this area during an excavation near the UST area in 1985. Leaks were discovered during the excavation in many of the tanks, and CCF began planning voluntary remediation. Eventually, 23 USTs were removed. Contaminated soils surrounding five of the tanks were removed to a Franklin County landfill in Columbus, Ohio, in compliance with the Ohio Fire Marshals Office (OEPA, 1991). Contaminated soils surrounding the other 18 tanks were used as partial backfill in the area of the 23 removed tanks. These tanks contained MEK and other solvents.

In 1986, the facility installed four ground-water monitoring wells and three remedial ground-water sumps to monitor and capture the contaminated ground water at the facility's Removed Underground Storage Tank Area (AOC 1). Also, CCF submitted an amendment with their POTW permit to install an aerobic digestion pretreatment unit on February 9, 1988. The pretreatment unit will treat ground water from AOC 1 contaminated by MIBK, xylene, MEK, and toluene. Wastewater meeting the conditions of the permit will then be discharged to the sanitary sewer. The permit to discharge wastewater was approved, but the amendment was denied in 1989. The facility is currently investigating additional treatment technologies for AOC 1.

On November 27, 1991, a minor spill of waste ink was reported at the facility. The spill occurred as a result of a Schneider Tank Lines driver having not properly secured the transfer hose during a hazardous waste loading operation on the north outside wall of Building 95 HWSA (SWMU 2). The hose slipped out of the fill port and discharged approximately 100 to 150 gallons of waste ink onto the North Loading Dock area. Schneider Tank Lines and Safety-Kleen Corporation personnel cleaned up, labeled, and stored the waste appropriately (CCF, 1991b). No soil samples were taken to verify that the spill was completely cleaned up.

2.5

REGULATORY HISTORY

CCF submitted a Notification of Hazardous Waste Activity to EPA on August 20, 1980 (Borden, 1980). The facility submitted a RCRA Part A permit application on November 17, 1980. This application listed the following process codes and capacities: T03 (20 gallons per hour), S01 (204 drums), and S02 (600 gallons) (CCF, 1980). The S01 code referred to SWMU 1, the Building 37 HWSA. The S02 code referred to a 600-gallon waste tank. The T03 code referred to an incinerator. The S02 and T03 items were apparently listed on the Part A permit application by mistake. PRC could not find any other reference to these items, nor did facility representatives know of their existence. Twenty-one hazardous waste codes are listed on the application: D001, D002, D005, D006, D007, D008, F001, F002, F003, F005, F006, F009, K054, P001, P029, P030, P090, P098, P106, U013, and U151. The storage location for these wastes was listed as SWMU 1. A list of 33 air permits was included as an attachment to the application (CCF, 1980).

The facility was issued a Part B permit on September 28, 1984 (EPA, 1984). The facility maintained interim status as a hazardous waste generator and storage facility until 1991 (OEPA, 1991). On May 23, 1991, when they informed OEPA and EPA that the facility intended to cease handling hazardous wastes in a manner that required a hazardous waste facility permit. A closure plan for SWMU 1 was submitted on June 28, 1991. The closure plan has not been approved by OEPA Central District office and EPA as of July 31, 1992 (PRC, 1992b). Currently, the facility is considered a large quantity generator (PRC, 1992a). The facility currently has about 101 active air permits.

A compliance inspection in 1989 indicated the facility violated 40 CFR Part 268.7. This notice of violation was for failing to comply with shipping regulations governing F-solvent wastes (EPA, 1989a). CCF complied with the notice of violation, and no other problems were noted (EPA, 1989b).

The facility's wastewater discharge is permitted under POTW permit No. JdPVCCF5a0147. The facility is permitted as a job shop and not as a categorical facility, since the electroplating line is operated only to maintain equipment. The City of Columbus tests the facility's discharge for cadmium, chromium, copper, lead, nickel, silver, zinc, cyanide, and pH (PRC, 1992c).

In February 1988, the facility applied for a National Pollutant Discharge Elimination System (NPDES) permit for discharging noncontact cooling process wastewater. OEPA has not responded to the application (PRC, 1992c).

The facility has four active and two inactive USTs. The four active USTs are 10,000-gallon stainless-steel product containers. The products are MIBK, MEK, MEK-MIBK mixture, and mineral spirits. The inactive USTs are an overflow container and a spill container. Facility representatives stated that the four active USTs currently pass tightness testing. The two inactive USTs are 10,000-gallon capacity and constructed of steel. These two USTs did not pass the last tightness tests. The testing contractor observed corrosion from water on the inside of the tanks, although no release to environmental media was documented. The facility is currently pursuing closure of the two inactive USTs with the City of Columbus and the Ohio State Fire Marshall. The facility intends to abandon the USTs in place and has contracted with T.M. Gate, Inc., of Milford, Ohio, to conduct soil sampling (PRC, 1992c).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the CCF facility.

2.6.1 Climate

The climate in Franklin County is characterized by cold winters and hot, humid summers, with a yearly average temperature of 52°F. The lowest monthly average temperature is 30°F in January, and the highest monthly average temperature is 75°F in July (ODNR, 1980).

Precipitation in central Ohio is evenly distributed throughout the year. The average yearly precipitation for Franklin County is 36.71 inches. Rainfall peaks occur in March at 4.18 inches, with only 2.23 inches of precipitation in October. The 1-year, 24-hour rainfall average is 2.3 inches, and the average yearly net precipitation is 3.71 inches (U.S. Department of Commerce, 1968a).

The prevailing wind is to the northeast and averages 9 miles per hour throughout the year (ODNR, 1980). The mean annual lake evaporation is about 33 inches (DOC, 1968b).

2.6.2 Flood Plain and Surface Water

The CCF facility is not located in any flood plain or flood prone area (FEMA, 1983). The nearest surface water body, the Olentangy River, is located 1.5 miles east of the facility and is classified as a warm water habitat, with agricultural and industrial water supply users. In addition, the Olentangy River is used for rowing, canoeing, and fishing activities (PRC, 1992a). Storm water drainage from the facility is to storm sewers that discharge to the Scioto River. The Scioto River drains to the Ohio River which drains to the Mississippi River (OEPA, 1989). The facility has applied for a NPDES permit to discharge noncontact cooling water to the storm sewer system. No other drainages, surface water bodies or wetlands are present within 1.5 miles of the facility.

2.6.3 Geology and Soils

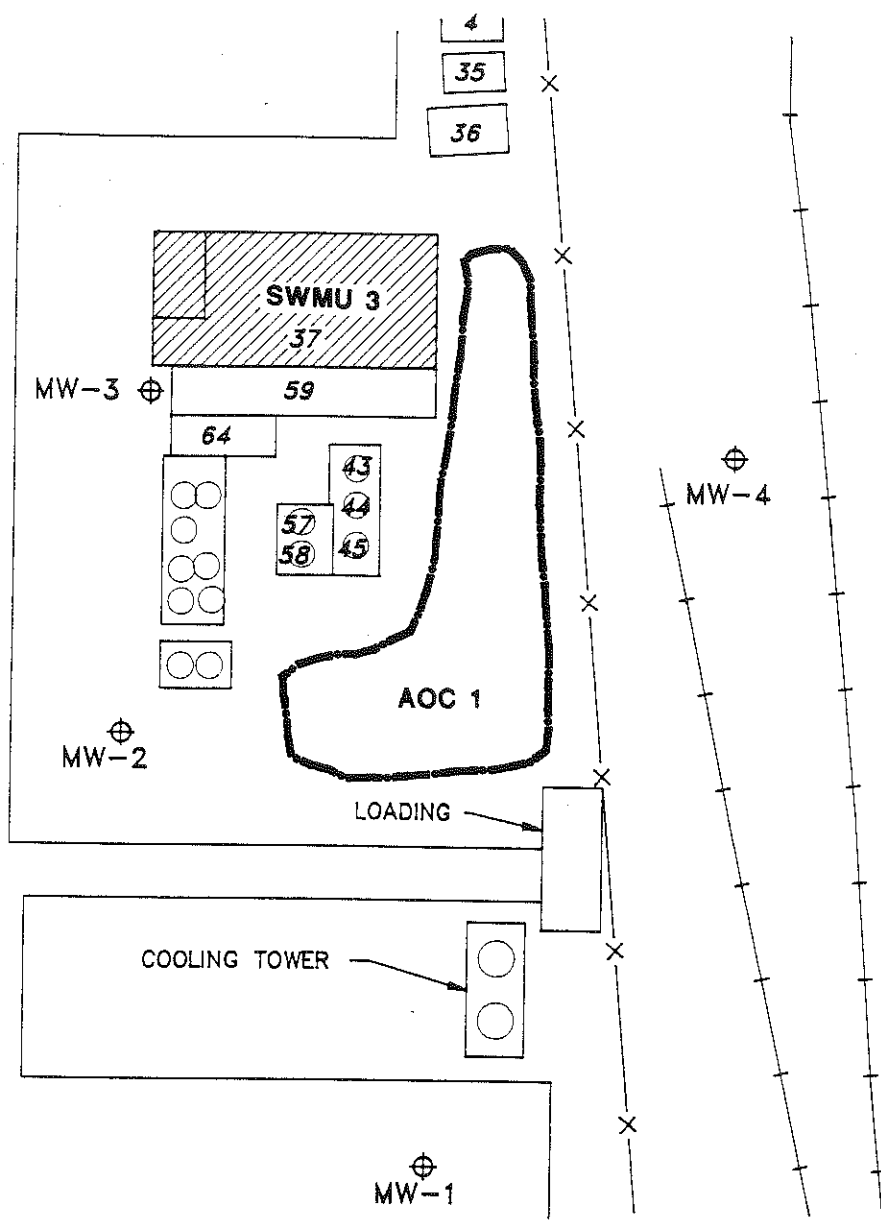
Franklin County is located near the eastern edge of the Central Lowland Plains, a few miles east of the Appalachian plateau. This area is a relatively flat, glacial plain broken by a few narrow valleys cutting 50 to 100 feet below the level of the plain (Norris, 1959).

Central Ohio was covered by the Illinoian and Wisconsinan ice sheets. Melting ice deposited clay, silt, and permeable sand and gravels on the uneven Ohio Shale bedrock surface. The depth to bedrock is 40 to 57 feet below ground surface in this area. Beneath the Ohio Shale lies the Devonian age limestone, the principal aquifer in the area (T.M. Gates, 1986).

In 1986, CCF hired a consultant to install four ground-water monitoring wells. All wells were completed in shale bedrock. The installation of these wells found the geology of the facility to consist of 10 feet of brown to grey clay, clay fill, sand and gravel lenses, overlying more than 165 feet of light to dark grey fractured and weathered shale (T.M. Gates, 1986).

2.6.4 Ground Water

Four ground-water monitoring wells were installed at the facility in 1986 (see Figure 3). Soil samples were taken during installation of the wells and analyzed for evidence of contamination. Monitoring well analytical results detected phthalates in all wells, and ethylbenzene and xylene 3.5 to 5.0 feet below ground surface at MW-2. Three remedial ground-water collection sumps were also installed in 1986. Ground water collected from the sumps was analyzed and found to contain high levels of ethylbenzene, xylenes, acetone, MEK, mineral spirits, toluene, tetrachloroethene, and methylene chloride (T.M. Gates, 1986).



LEGEND

 **MW-1** MONITORING WELL & NUMBER

NOT TO SCALE

COLUMBUS COATED FABRICS CORPORATION
COLUMBUS, OHIO

FIGURE 3
MONITORING WELL LOCATIONS

PRC ENVIRONMENTAL MANAGEMENT, INC.

CCFC.DWG - 08/28/92 - R40

SOURCE: ADAPTED FROM CCF. SKETCH RECEIVED BY PRC MAY, 1992

Ground-water flow direction in the shale aquitard was determined by these wells as flowing to the west. A perched water table was found in MW-1, MW-3, and MW-4. The water table elevation for these wells was about 779 feet above mean sea level. Ground surface elevation at the facility is about 780 feet above mean sea level. MW-2 had a water level elevation 20 feet lower than the other three wells. All wells bail to dryness easily and about two days are necessary for the wells to recover fully. The Devonian limestone aquifer is capable of yielding up to 400 gallons per minute (T.M. Gates, 1986).

The facility has several production wells that are screened in the Devonian age limestone aquifer approximately 175 feet below ground surface. The limestone aquifer is overlain by about 165 feet of low permeability Devonian shale. Static water level in one of the on-site production wells is about 130 feet below ground surface. The Olentangy River discharges to this confined limestone aquifer. This observation is based on comparisons of static water levels in one of the on-site production wells and the water level of the river (T.M. Gates, 1986).

2.7 RECEPTORS

The CCF facility occupies 16.25 acres in an industrial, commercial and residential area in Columbus, Ohio (CCF, 1991b). The population within 3 miles of the facility is estimated at about 18,000 people.

The CCF facility is bordered on the north by several small service businesses, and the Ohio State Fairgrounds. The facility is bordered on the west by parking lots and a residential neighborhood. Several large industrial facilities exist to the south. The Chesapeake and Ohio, Norfolk and Western, and Conrail Railroads switching yards border the eastern edge of the facility. The nearest school, Weinland Park School, is located about 1,000 feet west of the facility. Facility access is controlled by 24-hour security guards and a 10 foot high chain link security fence.

The nearest surface water body, the Olentangy River, is located 1.5 miles east of the facility and is classified as a warm water habitat, with agricultural and industrial water supply users. In addition, the Olentangy River is used for rowing, canoeing, and fishing activities (PRC, 1992a).

Ground water is used for industrial purposes both on site and within about 3 miles south of the facility. The nearest off-site industrial water well is 1,000 feet southeast of CCF (ODNR, 1992). This well is downgradient of the facility. No drinking water is obtained from ground water in this area of Franklin County. Drinking water for this section of Franklin County is

obtained from the Dublin Road Treatment Plant. This plant obtains its water supply from Griggs and O'Shaughnessy Reservoirs near the confluence of the Olentangy and Scioto Rivers (City of Columbus, 1990).

There are no sensitive environments located on or within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1

Building 88 SAA

Unit Description:

The Building 88 SAA is located near the tray washing operations (see Photograph No. 6). This unit is located indoors on a concrete floor. This unit measures about 5 feet wide by 6 feet long. Waste is accumulated in 55-gallon drums that are placed directly on the concrete floor of the unit. No floor drains are present in the area.

Date of Startup:

This unit began operation in about 1980.

Date of Closure:

This unit is active.

Wastes Managed:

The unit is used for the accumulation of spent solvent (D001, D007, D008, F003, F005 and K086) generated during ink production operations. When full, drums are moved to SWMU 2 for 90-day storage. Cousins Waste Control of Toledo, Ohio, transports the spent solvent to Petro Chem of Detroit, Michigan, for fuel blending.

Release Controls:

This unit is located indoors on a concrete floor with no floor drains nearby. Wastes are accumulated in 55-gallon drums using a wide mouth funnel. No berms or other release controls are present.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

During the VSI, PRC observed ink stains on the walls and floor of this unit. The unit contained two partially-filled 55-gallon drums of hazardous waste at the time of the VSI. One drum contained a wide mouth funnel placed in the bung hole of the drum.

SWMU 2**Building 95 HWSA****Unit Description:**

The Building 95 HWSA is presently used as the primary HWSA. Hazardous wastes are moved from SAAs (SWMUs 1, 4, 5, 6, and 7) for less than 90-day storage of hazardous wastes in this unit. This unit is located inside the concrete building at the northeast end of the main complex (occupying all of Building 95 and the northern half of Building 23). This unit has a poured concrete floor measuring about 18 feet wide by 200 feet long, and a corrugated steel roof (see Photograph No. 2). Floor drains in this area have been sealed, and the exits are elevated about six inches above floor level. Hazardous wastes are stored in drums on the floor of the building and on racks two drums high.

Date of Startup:

This unit began operation in 1985.

Date of Closure:

The unit is active.

Wastes Managed:

This unit manages spent solvent (D001, D008, F003, F005 and K086) from SWMU 1; waste ink (D001, D007, D008, F003, F005, and K086) from SWMU 4; spent stripper (D007), muriatic acid-soaked rags (D007), spent muriatic acid (D007), sludge (F006), and chromic acid-soaked rags (D002 and D007) -- all from SWMU 5; and waste urethane solvent (D001 and D005) from SWMU 4. These wastes are disposed of at the following facilities:

- Spent solvent - Petro Chem of Detroit, Michigan
- Waste ink - Safety-Kleen Corporation of Dolton, Illinois
- Spent stripper - Petro Chem of Detroit, Michigan
- Muriatic acid-soaked rags - Michigan Disposal of Belleville, Michigan
- Spent muriatic acid - CyanoKEM of Detroit, Michigan
- Sludge - Michigan Disposal of Belleville, Michigan
- Chromic acid-soaked rags - CyanoKEM of Detroit, Michigan

- Waste urethane solvent - Petro Chem of Detroit, Michigan

Release Controls:

The unit has a poured concrete floor measuring about 18 feet wide by 200 feet long, and a corrugated steel roof. Floor drains in this area have been sealed closed with concrete, and the exits are elevated about six inches above floor level. Hazardous wastes are stored in drums on the floor of the building. There are no operational floor drains in the area. Waste is transferred to tank trucks using a hose and pump that connect through a wall-mounted valve.

History of Documented Releases:

A spill occurred in the area outside the north exit of Building 95, on November 27, 1991. A hose broke loose from a tank truck pumping solvent-based waste ink from drums stored at this unit to the tank truck. An estimated two to three drums of waste ink spilled in this outdoor area. Seven drums of waste and clean-up materials were generated by clean-up operations. Clean-up operations were performed by Schneider Tank Lines and Safety-Kleen Corporation personnel.

Observations:

Wastes are stored in 55-gallon drums in Building 95. One-hundred fifty-eight drums of waste, with hazardous waste labels dated with accumulation start dates ranging from May 6, 1992 to May 19, 1992, were present during the VSI. No cracks were present in the concrete floor. Small stains were observed on the floor of the unit during the VSI.

SWMU 3

Building 37 HWSA

Unit Description:

The Building 37 HWSA occupies all of Building 37. This unit is listed on the RCRA Part A permit application and has not undergone closure (closure plan has been submitted for review). The unit currently stores wastes for less than 90 days. The building has a six-inch thick concrete floor, with four-inch high concrete curbs, and elevated exits. Dimensions of the floor are 34 feet wide

by 72 feet long. No drains are located in the area (see Photograph No. 1).

Date of Startup: The building was built in 1929. Hazardous wastes have been stored at this unit since 1980.

Date of Closure: This unit is currently active. However, the closure plan for this unit was submitted for approval to OEPA and EPA on January 13, 1992 and closure operations were scheduled for the summer of 1992.

Wastes Managed: This unit manages spent solvent (D001, D007, D008, F003, F005, and K086) from printing operations; dust stop oil (D006 and D008); and spent filter bags (D006).

Cousins Waste Control of Toledo, Ohio, transports the spent solvent off site to Petro Chem of Detroit, Michigan. Cousins Waste Control of Toledo, Ohio, transports the dust stop oil and spent filter bags off site to Usher Oil of Detroit, Michigan, for disposal.

Release Controls: This unit is located indoors. The building has a six-inch thick concrete floor, with four-inch high concrete curbs, and elevated exits. Dimensions of the floor are 34 feet wide by 72 feet long. No drains are located in the area.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: Thirteen, 55-gallon drums containing spent solvent and one 55-gallon drum of waste ink were stored in this area at the time of the VSI. Small surface cracks are visible on the floor of the unit. All drums were sealed, and properly labeled. No evidence of release was noted.

SWMU 4 **Building 111 SAA**

Unit Description: The Building 111 SAA is located in the northeast corner of the Building 111 (see Photograph No. 5). This unit is used for the

accumulation of hazardous waste inks. Waste ink is pumped into waste drums when ink colors cannot be recycled or ink no longer meets specifications for use. The unit measures about 10 feet long by 5 feet wide. The floor of the unit is concrete, and no floor drains are present.

Date of Startup: This unit began operations in 1980.

Date of Closure: This unit is active.

Wastes Managed: This unit manages accumulated waste ink (D001, D007, D008, F003, F005, and K086) from recycling operations. Waste ink is moved to SWMU 2 for less than 90-day storage.

Release Controls: This unit is located indoors on a concrete floor with no floor drains nearby.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, PRC observed numerous spills of ink. Two drums were being used to accumulate hazardous waste solvent-based ink.

SWMU 5 Building 101 SAA

Unit Description: The Building 101 SAA is located on the west side of Grant Avenue between Eighth and Ninth Avenues. The unit is used for the accumulation of hazardous wastes generated from the electroplating line, which occupies all of Building 101. The unit measures about 5 feet wide by 5 feet long, and is located in the loading dock area (see Photograph No. 3). The floor of the unit is concrete, and no berms are present. No drains are located in the area.

Date of Startup: From the late 1950s to about 1989, the building housed a full-scale electroplating operation. Since 1989, electroplating operations have been limited to print roller repair.

Date of Closure: The unit is active.

Wastes Managed: The unit manages spent stripper (D007), muriatic acid-soaked rags (D007), spent muriatic acid (D007), sludge (F006), and chromic acid-soaked rags (D002 and D007). These wastes are then moved to SWMU 2 for less than 90-day storage.

Release Controls: This unit is located indoors and has a concrete floor. No floor drains are present in the immediate area. However, floor drains discharging to the limestone sump and sanitary sewers are located about 50 feet from the unit.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: This unit is located in the loading dock area of Building 101. Two partially filled 55-gallon drums of D002 and D007 waste were present at the time of the VSI. Several small brown stains were present on the floor in front of the drums.

SWMU 6

Treatment Sump

Unit Description: The Treatment Sump is located indoors in the southeast corner of Building 101. The unit is a 28-inch diameter by 48-inch deep concrete sump containing a stainless-steel basket of limestone. The sump is cleaned out quarterly. The unit contains a sewer drain that discharges to a manhole located outdoors about 75 feet west of the sump. No photograph was taken of this unit.

Date of Startup: The sump was installed in the late 1950s.

Date of Closure: The unit is active.

Wastes Managed: The unit collects sludge (F006) from the electroplating line and filters nonhazardous wastewater into the city sewer system. Sludge (F006) is cleaned out quarterly and accumulated in 55-gallon drums in the Building 101 HWSA (SWMU 5) then moved to the Building 95 HWSA (SWMU 2).

Release Controls:	The unit is located indoors. The building has a trench system to collect any spills.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	PRC observed no cracks and only minor stains on this unit.
SWMU 7	Building 23 SAA
Unit Description:	The Building 23 SAA is located near the east wall of Building 23 (see Photograph No. 4). The unit is used for accumulation of waste urethane solvents (D001 and F005) generated by a urethane coating operation in Buildings 10 and 31. The unit measures about 5 feet wide by 5 feet long. The unit is located indoors on a concrete floor, and no floor drains are present. This building adjoins SWMU 2.
Date of Startup:	The unit began operations in about 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages waste urethane solvent (D001 and F005) hazardous wastes generated by urethane coating operations in Buildings 10 and 31. This waste is moved to SWMU 2 for less than 90-day storage.
Release Controls:	The unit is located indoors and on a concrete floor. There are no floor drains in the area.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, small spills (about one square foot in area) were observed on the floor and walls of the unit. No materials were stored in the unit at the time of the VSI. No cracks were visible on the floor.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; the location is shown on Figure 2.

AOC 1 Removed Underground Storage Tank Area

The Removed Underground Storage Tank Area is located on the southeast side of Building 37. CCF used USTs for storage of solvents. Volatile organic contamination was discovered in soil and ground water in this area during an excavation near the UST area in 1985. Leaks were discovered in many of the tanks, and CCF began planning voluntary remediation. The USTs contained solvents, gasoline, kerosene fuel, and ethyl acetate. Eventually, 23 USTs were removed. Contaminated soils surrounding five of the mineral spirits USTs were removed to the Franklin County Landfill of Columbus, Ohio, in compliance with the Ohio Fire Marshals Office (OEPA, 1991). Contaminated soils surrounding 18 tanks were used as partial backfill in the area of the removed tanks. The 23 removed tanks contained MEK and other unknown solvents. Three collection sumps were installed in the excavated area as a means of removing contaminated ground water. In August 1986, four ground-water monitoring wells were installed in this area by T. M. Gates of Milford, Ohio. Soil and ground-water samples were taken during the investigation. Chloroform, methylene chloride, tetrachloroethene, 1,1,1-trichloroethane, trichloroethene, toluene, ethylbenzene, xylene, acetone, MEK, and mineral spirits were detected in both soil and ground water along with dimethyl phthalate, diethyl phthalate, di-n-butyl phthalate, butylbenzyl phthalate, bis (2-ethyl hexyl) phthalate, and di-N-octyl phthalate (OEPA, 1992). Design of a remediation system is in progress.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified seven SWMUs and one AOC at the CCF facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors are presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, are presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3 summarizes the SWMUs and AOC at the CCF facility and recommended further actions.

SWMU 1 Building 88 SAA

Conclusions:

This unit is located indoors on a concrete floor with no visible cracks. Housekeeping practices were poor (evidence of numerous spills on floor and wall of the unit). The potential for release to environmental media is detailed below.

Ground Water, Surface Water, and On-Site Soils: The potential for release is low. The unit is indoors on a concrete floor. No floor drains are located in the area.

Air: The potential for release is high. Evidence of spill and a drum with an open funnel indicate that volatiles from the waste ink are allowed to volatilize into the building's air space.

Recommendations:

PRC recommends that the facility improve waste management practices, and drums be stored closed - with no funnels in the bungs unless filling operations are in progress.

SWMU 2 Building 95 HWSA

Conclusions:

This unit is the primary HWSA for the facility. Several hundred drums of waste may be stored in this area at any one time. Release controls are present inside Building 95. One hundred to 150 gallons of waste were spilled during transfer operations in 1991. The interior of Building 95 does not appear to allow a release inside the building from contaminating environmental media. However, there is the potential for further

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contamination outdoors from transfer operations. The potential for release to environmental media is detailed below.

Ground Water: Moderate. A release to the transfer dock has occurred; however, it is not known if ground water quality has been impacted by this unit.

Surface Water: Low. A release to surface water is unlikely due to the distance of the site from surface water.

Air: Low. Hazardous wastes managed by this unit are stored in sealed containers.

On-Site Soils: A release to the transfer dock was documented in 1991. The spilled material was cleaned up, however, no sampling was performed to determine if residual contamination exists.

Recommendations: PRC recommends that soil sampling be performed and analyzed for volatiles, semivolatiles, and metals.

SWMU 3 Building 37 HWSA

Conclusions: No releases have been documented from this unit, wastes are stored in sealed drums on a concrete floor, and the unit is scheduled to undergo full closure in 1992. The potential for release to environmental media is low.

Recommendations: PRC recommends the facility continue to work with OEPA to close this unit.

SWMU 4 Building 111 SAA

Conclusions: This unit is located indoors on a concrete floor with no visible cracks. Housekeeping practices were poor at this unit (evidence of numerous spills on floor and wall of the unit). The potential for release to various environmental media is described below.

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Ground Water, Surface Water, and On-Site Soils: The potential for release is low. The unit is indoors on a concrete floor. No floor drains are located in the area.

Air: The potential for release is high. Spills observed during the VSI indicate that volatiles from the spent solvent are allowed to volatilize into the building's air space.

Recommendations: PRC recommends the facility improve its waste management practices.

SWMU 5 Building 101 SAA

Conclusions: The unit is located indoors on a concrete floor, and wastes are accumulated in closed containers. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 6 Treatment Sump

Conclusions: This unit is located indoors within a concrete floor, with no visible cracks. The potential for release to environmental media is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 7 Building 23 SAA

Conclusions: This unit is located indoors on a concrete floor, and wastes are stored in closed containers. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action for this SWMU.

AOC 1 Removed Underground Storage Tank Area

Conclusions: Ground water in this area is contaminated, and tanks have been removed. Remediation of the ground water will commence when final design, OEPA approval, and other required permits are obtained.

RELEASED
DATE 4/2/84 29
RIN #
INITIALS WV

ENFORCEMENT
CONFIDENTIAL

Recommendations: PRC recommends the facility continue working to obtain OEPA approval of remediation activities.

RELEASED
DATE 4/2/01
RIN #
INITIALS WV

ENFORCEMENT
CONFIDENTIAL

TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Building 88 SAA	1980 to present	None	Housekeeping be improved, and drums be stored closed - with no funnels in the bungs unless filling operations are in progress
2. Building 95 HWSA	1985 to present	Spill in 1991	Soil sampling
3. Building 37 HWSA	1980 to present	None	Continue to work with OEPA to close this unit
4. Building 111 SAA	1980 to present	None	Improve waste management practices
5. Building 101 SAA	1980 to present	None	No further action
6. Treatment Sump	1950s to present	None	No further action
7. Building 23 SAA	1980 to present	None	No further action
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Removed Underground Storage Tank Area	Unknown to 1985	Leaks discovered during excavation for containment wall	Continue to work to obtain approval for remediation activities

RELEASED
DATE 4/2/01
RIN #
INITIALS CV

**ENFORCEMENT
CONFIDENTIAL**

REFERENCES

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- Norris, Stanley E., 1959. Buried Topography and Its Relationship to an Important Aquifer in Franklin County, Ohio, Ohio Journal of Science, November.
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- PRC, 1992b. Log of Telephone Conversation between Gabriel Rood, PRC, and Grover Thomas, CCF, July 31.
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U.S. Geological Society (USGS), 1982a. 7.5 Minute Topographic Map of Northwest Columbus, Ohio.

USGS, 1982b. 7.5 Minute Topographic Map of Northeast Columbus, Ohio.

USGS, 1983. 7.5 Minute Topographic Map of Southeast Columbus, Ohio.

USGS, 1984. 7.5 Minute Topographic Map of Southwest Columbus, Ohio.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER OHD004294351

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Columbus Coated Fabrics	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 1280 North Grant Ave.				
03 CITY Columbus	04 STATE OH	05 ZIP CODE 43215	06 COUNTY Franklin	07 COUNTY CODE 049	08 CONG DIST .
09 COORDINATES: LATITUDE 39° 59' 23" N		LONGITUDE 82° 59' 23" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Travel west on 5th Ave. and turn right on to North Grant Ave.					

III. RESPONSIBLE PARTIES

01 OWNER (If known) Borden, Inc.	02 STREET (Business, mailing, residential) 180 E. Broad Street				
03 CITY Columbus	04 STATE OH	05 ZIP CODE 43215	06 TELEPHONE NUMBER (614) 225-4000		
07 OPERATOR (If known and different from owner) Columbus Coated Fabrics	08 STREET (Business, mailing, residential) 1280 North Grant Avenue				
09 CITY Columbus	10 STATE OH	11 ZIP CODE 43215	12 TELEPHONE NUMBER (614) 697-6000		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED: <u>8 / 20 / 80</u> MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY (Check all that apply) <input checked="" type="checkbox"/> YES DATE <u>5 / 18 / 92</u> <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> NO <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): <u>PRC Environmental Management, Inc.</u>	
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	03 YEARS OF OPERATION <u>1902</u> Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED methyl isobutyl ketone, xylene, methyl ethyl ketone, and toluene	
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Release to ground water documented when twenty-three underground storage tanks were removed.	

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input checked="" type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
---	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Gabriel Rood	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (513) 241-0148	08 DATE 5 / 18 / 92 MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Columbus Coated Fabrics (CCF)
Columbus, Ohio
OHD 004 294 351

Date: May 19, 1992

Facility Representatives: Grover B. Thomas, Environmental Manager, CCF
John Sykes, Environmental Coordinator, CCF
Gary L. Tong, Environmental Engineer, Borden, Inc.

Inspection Team: Gabriel Rood, PRC Environmental Management, Inc. (PRC)
Trisha Miller, PRC

Photographer: Trisha Miller, PRC

Weather Conditions: Sunny and warm, temperature 70°F.

Summary of Activities: PRC and CCF representatives held a kick-off meeting at 10:00 a.m. The purpose of the meeting was to answer questions raised during the PA. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI inspection was conducted following the kick-off meeting. Waste generation points, six solid waste management units (SWMU) and one area of concern were documented.

The VSI tour was completed at 1:50 p.m., after which the inspection team held a brief exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 2:00 p.m.



Photograph No. 1
 Orientation: North
 Description: Drum staging area for Building 59 and 37

Location: SWMU 3
 Date: 5/19/92



Photograph No. 2
 Orientation: North
 Description: Drums of hazardous waste are stored here until a tanker truck pumps the waste from the drums.

Location: SWMU 2
 Date: 5/19/92



Photograph No. 3
 Orientation: North
 Description: Building 101 Satellite Accumulation Area

Location: SWMU 3
 Date: 5/19/92



Photograph No. 4
 Orientation: Southeast
 Description: Building 23 Satellite Accumulation Area. No waste was present at the time of the VSI.

Location: SWMU 4
 Date: 5/19/92



Photograph No. 5

Orientation: East

Description: Off-specification solvent-based inks are pumped into these drums for accumulation until full.

Location: SWMU 4

Date: 5/19/92



Photograph No. 6

Orientation: South

Description: Building 88 Satellite Accumulation Area. Wastes are generated when pans filled with solvent-based inks are cleaned.

Location: SWMU 1

Date: 5/19/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

SOKKIA

MADE IN JAPAN

Index

FORMULAS FOR SOLVING

5/19/92 Tuesday
 Columbus Coated Fabrics
 Preliminary Assessment
 Visual Site Inspection
 1280 Grant Ave.
 Columbus, OH 43266
 Ph (614) 297-6000
 Contact: Grover Thomas
 John Sykes
 EPA ID# : OHD004294351

1000 Gabe Road and
 Trish Miller on-site
 at 1250 Grant Ave
 meet w/ John Sykes and
 Grover Thomas to
 carry out pre-site interview
 weather: sunny, warm
 ~ 70°F

Facility covers ~ 13 acres
 under roof 16.25 total acres
 currently mixed vinyl
 wall coverings 1500 yds
 laminates, wall tile - resid
 commercial wall coverings

Art Road 5/19/92

5/19/92 Tuesday
 1900 - Columbus Fabrics
 waterproof Company - vinyl
 4 inch protective floor - 40 mil
 1902 - Columbus Oil Cloth
 Company - Oil Cloth
 1917 - Col. Oil Cloth & Liner
 Oil Cloth combined
 installed at this location
 on Grant Ave, used for
 - collared catwalks, mit
 area, tube coverings &
 shade cloth
 1925 - coated fabric
 wall coverings → used for
 wall coverings for bathroom
~~Room materials~~ 65R
 1954 - purchase of first lot of
 takes various pigments, stable
 fluxes, binder which
 produce continuous web
 of material 2 to 40 mil
 thick.
 1959-1961 Borden Chemical
 purchases facility.
 Art Road 5/19/92

5-19-92

(6)

FOO - Linestone sump
in Bldg. 101 - to remove
heavy metals + limestone
sludge removed a long
w/ limestone - electroplating
waste - Michigan Dept
in Belleville, MI

* Spent Ink Stripper -
do not use much of
this (DOOT - Chrome)

Chromic acid ^{soaked} rags -
from Elect. Plating shop Bldg
101 → Bldg 37 for storage

Spent Muratic Acid + soaked
rags DOOT 2, DOOT + DOOT
from electro. plating shop

DN-14 - top coats
(protective coating) done in
coat shop X-linked

wretham coat, non-burnable
coating DOOT + FOO5
waste (MEK). Petrochem
Processing in Detroit, MI

Start / End 5/19/92

5-19-92

(7)

Water-based urethane
system generator DOOT
(could/w. waste control
sends it to Chem Dept
in Wyandot MI
(Cowins is a brokerage firm)

Spent Ink Area

- 1) Ink mix (Bldg 11)
- 2) Drum Washer (~~DOOT~~ 23)
- 3) DN-14 (Bldg 23)
- 4) South mix (formerly Pan work item
drum wash) Bldg 35 + 58
- 5) Bldg 101 - Chrome Plating waste

Between 550 - 600 employees
working 3 shifts/day
Security Guard Station
and camera system, door
buzzers controlling access
chain link security fence.

Air permits -
8 Bldg 101 - 5000 sq ft
2 boilers. machines 40' x 40' x 10'

No NPDES permit

Air Condn. 5 plating tanks
1 rotary screen grid 10' x 10' x 10' screening
4 40' x 10' x 10' screening

Start / End 5/19/92

5/19/92 Tuesday
Total # of air permits = 21/01
active

3 waste water discharges
2 pts in front of Garret
Sheet at Garret Ave + 6th
and bldg 101

Underground Storage Tanks
removed in 1990 and remediation
is planned using 9 sumps
w/ pumps - analytical results
are used to design a
treatment system.

Spill the day before
Thanksgiving 1991 - hose
broke loose from truck
behind Bldg 25 on the north
east-west side spilling waste
ink ~ 2-3 drums & 7 drums
of cleanup material removed
by Schneider + Safety Klean.

~~John Road
5/19/92~~

5/19/92 Tuesday
Hazardous waste storage
Area in use since
approx. 1980

Bldg 95 has been used for
storage of waste ~ 1985

Chrome Plating Area - Bldg
101 - Satellite Accum.
Area.

1130 Gabbe Road - PPC
Trish Miller - PPC
off site for lunch
will return at ~ 1200
for site tour

1212 - Gabbe Road - PPC
+ Trish Miller - PPC
Return to site begin
5:30 PM

Visit satellite accumulation area
in Bldg 11 where this activity
has occurred since ~ 1985 where

5/19/92 John Road

(10)

5/19/92

Tuesday

SAA1 - where paint is mixed and recycled and up in Bldg 95 drums are stored here for max of 72 hours. Typically 60 drums/day generated area concrete po cracks ~10' x 10' solvent based inks

Solvent Sludges Bldg 88 Safe Hk Area - 2 drums of KO86, D001, D007, F003 + F005 concrete floor evidence of ink spills tray washing area from Greener trays used to hold inks

Bldg 35 - Safe Hk Area, D008 Dry waste to Air Cloth Drum washing Area from cleaning D008 some Sludge. D008 Some liquid waste goes to Bldg 37 Sol. Hk. Ink

John Road 5/19/92

(11)

5/19/92

Tuesday

AOC - former AST where tank removal occurred 9 Sumps inside the water connected

Bldg 37 - former RCPA hazardous waste storage area Bldg 1929 concrete floor brick block

presently 14 drums containing waste drums containing D001, F003, F005 (MEX, MEX) all drums have room. Start date 5 of 4/1/92 - drums

1 drum w/ F005 code "Solds from ink waste drums source Bldg 95 - acc. start date listed as 5-19-92

this is the drum storage pad. This Building contains concrete beneath recessed floor, spill prevention in doors, 37 x 72

John Road

5/19/92

5/19/92 Tuesday (12)

Bldg DN-14 - wreath protect.
Coating waste - 200 lbs
satellite acq area no drums
present waste goes to
Bldg 37 area has
evidence spills as
well as mixing area
immediately adjacent next
to Bldg 90

Bldg 95 concrete floor
and block building this
is adjacent to intelligence
accum. area for DN-14
some evidence of spills
drums stored here as F003
F005, D001, D007, D008
K086 (MEK, MIAK)
158 drums present
in this area. Acc. dates
range from 5/6/92 to 3/8/92
doors have 6" concrete
berms. Estimated 20'
x 200' (see map for correct dimensions)

Hubel/Kood 5/19/92

8/15/92 5/19/92 Tuesday (13)

Electroplating building
several etc. drums
2 drums
1 - D002 - D007 (MEK + Chrom)
1 - spent ind. chrome
plating D007
1100 gal. fuel

this area is located on
the loading dock - 1"
wide filled cracks in concrete
running the length and width
of loading dock area
no berms to outside

Floor sumps in this building
for discharge to sanitary
sewers. Water is treated in
1. mustop filled sump
2. 8" diameter and
48" height

1st. 2-55 gallon drums
of material removed
surrounding buildings are
small service businesses, parking lots
and residential area west

Hubel/Kood 5/19/92

(14)

5/19/92
Tuesday
of the Academy.
1400 PRC
off-site

(15)

Photo Log
5/19/92 Tuesday
Columbus Casted Fabric 12.5
Roll 1
Building III
Photo #1
Time 1231
Sattell. & etc. three colors
inks are recycled. until
spent, two drums presently being
filled, moved to Bldg. 35
for 90 day storage when full



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

May 14, 1992

Mr. Grover Thomas
Columbus Coated Fabrics
1250 Grant Ave.
Columbus, Ohio 43216

Re: Visual Site Inspection
Columbus Coated Fabrics
Columbus, OH
ID No. OHD 004 294 351

Dear Mr. Thomas:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for May 19, 1992 at 10:00 a.m. The inspection team will consist of Gabriel Rood and Trish Miller of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio EPA may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

May 14, 1992
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA - Columbus Office
Andrew Kubalak, OEPA - Central District Office

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Columbus Coated Fabrics, Div. of Borden Chemical, Borden, Inc.
EPA I.D. NUMBER: OHD004294351
LOCATION CITY: Columbus
STATE: Ohio

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u> </u>	<u> x </u>
• Surface Impoundment	<u> </u>	<u> x </u>
• Land Farm	<u> </u>	<u> x </u>
• Waste Pile	<u> </u>	<u> x </u>
• Incinerator	<u> </u>	<u> x </u>
• Storage Tank (Above Ground)	<u> </u>	<u> x </u>
• Storage Tank (Underground)	<u> </u>	<u> x </u>
• Container Storage Area	<u> </u>	<u> x </u>
• Injection Wells	<u> </u>	<u> x </u>
• Wastewater Treatment Units	<u> x </u>	<u> </u>
• Transfer Stations	<u> </u>	<u> x </u>
• Waste Recycling Operations	<u> x </u>	<u> </u>
• Waste Treatment, Detoxification	<u> </u>	<u> x </u>
• Other <u>NA</u>	<u> </u>	<u> </u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

Wastewater Treatment Unit: (1) Pretreatment (neutralization/settling) of chromium and copper wastes in on-site concrete tank prior to discharge to the city sanitary sewer system. In 1985, 500 gallons of F006 sludge hauled to approved RCRA facility for handling. (2) Small pre-treatment tanks are used for blender washwaters (manufacture of vinyl sheets) prior to discharge to city sewer system.

Waste Recycling Operation: Waste inks and wash solvent containing methyl-ethyl ketone solvents are processed on-site in a distillation system for (see below)

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

recovery. In 1985, 725 tons of still bottoms (F005) from this operation were disposed of at approved RCRA facilities.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

William G. Ilg, Senior Project Engineer
Environmental Coordinator

Typed Name and Title

William G. Ilg
Signature

3/12/86
Date